

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

In re:	§	
	§	Chapter 7
MICHAEL SCOTT LUSTER and	§	
JENNIFER ATCHISON LUSTER,	§	Case No. 19-32203-BPC
	§	
Debtors.		

PURSUANT TO LOCAL RULE 9007-1, THIS MOTION WILL BE TAKEN UNDER ADVISEMENT BY THE COURT AND MAY BE GRANTED UNLESS A PARTY IN INTEREST FILES A RESPONSE WITHIN 21 DAYS OF THE DATE OF SERVICE. RESPONSES MUST BE SERVED UPON THE MOVING PARTY AND, IN THE MANNER DIRECTED BY LOCAL RULE 5005-1, FILED WITH THE CLERK ELECTRONICALLY OR BY U.S. MAIL ADDRESSED AS FOLLOWS: CLERK, U.S. BANKRUPTCY COURT, ONE CHURCH STREET, MONTGOMERY, ALABAMA 36104.

**APPLICATION FOR EMPLOYMENT OF PROFESSIONAL PERSONS
UNDER 11 U.S.C. § 327(e)**

COMES NOW, Carly B. Wilkins, trustee in the above-styled bankruptcy case (“the Trustee”), pursuant to 11 U.S.C. § 327(e), and requests that the Court enter an order authorizing her to retain the firm of Memory Memory & Causby, LLP (the “Firm”) as General Counsel incident to the above-styled case, and states the following:

1. On August 5, 2019, Michael Scott Luster (“the Debtor”) filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code (ECF Doc. 1). The Trustee was appointed to this case the following day.

2. The Trustee requests that the Court approve the employment of the Firm as General Counsel pursuant to 11 U.S.C. § 327(e) to pursue a cause of action in the receivership of Spirit Commercial Auto Risk Retention Group, Inc., currently pending in the State of Nevada.

3. The Trustee seeks to retain the Firm because of the Firm’s extensive experience in and knowledge of the field of bankruptcy and litigation in the federal bankruptcy courts.

Attached hereto as **Exhibit A** is the Firm's Rule 2014 Verification, which describes the qualifications of the Firm and its current attorneys and terms and conditions of employment.

4. Except as disclosed in **Exhibit A**, the Firm represents no interest that would be adverse to the bankruptcy estate in connection with the matters upon which the Firm is to be engaged.

5. The Firm has been approached to represent the Trustee. If the Court approves the Firm's proposed retention, it will not accept any engagement or perform any service adverse to the Trustee or any unsecured creditors.

6. The Firm does not have any interest or connection with the debtor, any equity security holders of the Debtor, if applicable, the United States Bankruptcy Administrator for this District, or any person employed in the office of the United States Bankruptcy Administrator, other than as disclosed herein.

7. The Firm has been involved in numerous bankruptcy-related matters for debtors, creditors, and trustees since 1978. A partial list of cases or matters may be provided upon request.

8. The Firm has not received any compensation in connection with the requested engagement on the behalf of the Trustee.

9. Court approval will be sought for the requested engagement and all fees and expenses.

10. The Firm shall be compensated on a 35% contingency basis, as further described in the verification (**Exhibit A**).

I, Carly B. Wilkins, have read this Application and the attached verification (**Exhibit A**).
The statements set forth herein are true and correct to the best of my knowledge, information,
and belief.

Respectfully submitted November 19th, 2019.

/s/ Carly B. Wilkins
Carly B. Wilkins
Chapter 7 Trustee
560 South McDonough Street
Montgomery, Alabama 36104
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Fax: 334-323-5666

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing document on the following, by placing same in the United States Mail, postage prepaid, and properly addressed and by e-mail or ECF (Pursuant to Fed. R. Bankr. P. 9036) on this the 19th day of November, 2019 on the following parties:

Danielle Greco, Esq.
U.S. Bankruptcy Administrator
One Church Street
Montgomery, Alabama 36104

Bradley A. Hawley, Esq.
The Law Office of Brad Hawley, LLC
830 Peachtree Street
Prattville, Alabama 36066

All creditors on the matrix.

/s/ Carly B. Wilkins